

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

United States District Court
Western District of Washington

KATHERINE MOUSSOURIS, HOLLY
MUENCHOW, and DANA PIERMARINI
on behalf of herself and a class of those
similarly situated,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

Case No. 15-cv-1483 (JLR)

**DECLARATION OF KATHERINE
MOUSSOURIS**

I, Katherine Moussouris, declare as follows:

1. I am a former employee of Microsoft and a named Plaintiff in the above captioned lawsuit. I understand that this Declaration will be filed in support of Plaintiffs' Motion for Class Certification. I have personal knowledge of the facts set forth in this Declaration, and could and would testify competently under oath if called as a witness.

1 2. I was employed in the Redmond, Washington office of Microsoft from
2 April 2007 to May 2014. I was hired as a Program Manager, Level 62. In 2008 I became a
3 Program Manager II, Level 63, and in 2010 I became a Senior Program Manager, Level 64. For
4 my entire tenure at Microsoft, I worked in the Engineering Profession.

5 3. I believe that Microsoft discriminated against me by compensating me less
6 than my male colleagues performing work of similar scope and quality. After I became a
7 manager, I also observed that other women were paid less than their male co-workers.

8 4. I believe that Microsoft discriminated against me by denying me
9 promotions that it instead gave to less qualified men. In June 2012, I was eligible for promotion
10 to Principal Program Manager (Level 65). The previous year, I had been responsible for
11 groundbreaking efforts in the security industry, including the highest-rated news announcement
12 for my organization that year, and the payout of substantial defensive security research prizes in a
13 program which I created. I did not receive the promotion to Principal, but two less qualified men
14 in my group were promoted over me, even though they had not performed the same scope of
15 work nor received the same level of recognition in the industry. The following year, in 2013, I
16 was again up for promotion to Principal. Microsoft again did not promote me. However, my male
17 colleague, Jerry Bryant, who did not have the same level of qualifications or responsibilities as I
18 had, was given leadership of the overall team.

19 5. I remained at a Level 64 from 2010 until I left Microsoft in 2014, even
20 though in 2013 my manager, Michael Reavey, told me that the scope and quality of my work had
21 been Principal level (Level 65) for years. I also saw other women in Engineering passed over for
22 promotion in favor of less-qualified men.

23 6. I observed that the culture at Microsoft is hostile towards women. Women
24 were frequently interrupted or talked over at meetings. I saw on several occasions that women
25 who shared their ideas were ignored, but that the same or similar ideas later presented by men
26 would be acknowledged and congratulated. Women's judgment and expertise were much more
27 likely to be called into question than men's. Finally, male colleagues excluded women from
28 important discussions and business opportunities. These problems were so pervasive that I had

1 conversations about them with other female employees and managers at Microsoft.

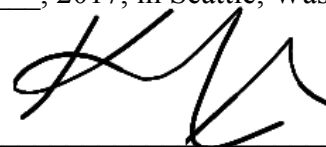
2 7. I believe that making complaints about discrimination to Microsoft's
3 Human Resources Department does not make any difference. In 2008, I complained about the
4 Director of my group, who was sexually harassing women in the group. HR investigated and
5 found that he had in fact sexually harassed these women, yet he was merely re-assigned to a
6 different group, while retaining his title and influence, and was subsequently promoted. I also
7 complained about retaliation when this same Director gave me a low bonus before he was
8 transferred to the new group, but HR took no action. Finally, I complained to HR when Jerry
9 Bryant, who was promoted over me, began to take away my responsibilities and assigned them to
10 a man two levels below me, and assigned me low-level tasks that no men in my group were asked
11 to do. Microsoft took no action on this complaint, either.

12 8. I understand the responsibilities of a class representative and I am prepared
13 to fulfill my duties to the women in the class. I have been actively involved in the litigation of
14 this case, including producing documents and appearing for a deposition. I have been in close
15 contact with the attorneys representing the class throughout the duration of the case, and on many
16 occasions have provided them with my input and advice regarding various aspects of the
17 litigation.

18 9. I understand that Microsoft's employment policies are developed in the
19 Redmond, Washington office, and apply companywide throughout the United States.

20
21 I declare under penalty of perjury under the laws of the United States that the foregoing is
22 true and correct to the best of my knowledge.

23 Executed this 27th day of October, 2017, in Seattle, Washington.

24
25 

26 Katherine Moussouris